


Approved: 
NI QIAN
Assistant United States Attorney

ORIGINAL

Before: THE HONORABLE STEWART D. AARON
United States Magistrate Judge
Southern District of New York

19MAG 6792

- - - - - X
: SEALED COMPLAINT
UNITED STATES OF AMERICA :
:
- v. - :
: Violations of
: 18 U.S.C. §§ 1349,
: 1344, 1028A, and 2
RASHAUN TRICE, :
SCOTT ACHEAMPONG, :
a/k/a "Montana," and :
TOURAY BLACKWOOD, :
:
Defendants. :
: COUNTY OF OFFENSE:
: BRONX
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

ROBERT MOERLER, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE
(Conspiracy to Commit Bank Fraud)

1. From at least in or about September 2018 up to and including in or about November 2018, in the Southern District of New York and elsewhere, RASHAUN TRICE, SCOTT ACHEAMPONG, a/k/a "Montana," and TOURAY BLACKWOOD, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States code, Section 1344.

2. It was a part and object of the conspiracy that RASHAUN TRICE, SCOTT ACHEAMPONG, a/k/a "Montana," and TOURAY BLACKWOOD, the defendants, and other known and unknown, willfully and knowingly would and did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit

Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Bank Fraud)

3. From at least in or about September 2018 up to and including in or about November 2018, in the Southern District of New York and elsewhere, RASHAUN TRICE, SCOTT ACHEAMPONG, a/k/a "Montana," and TOURAY BLACKWOOD, the defendants, did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, the defendants deposited stolen, forged, and/or altered checks into third-party bank accounts in an attempt to fraudulently withdraw said funds.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE
(Aggravated Identity Theft)

4. From at least in or about September 2018 up to and including at least in or about November 2018, in the Southern District of New York and elsewhere, RASHAUN TRICE, SCOTT ACHEAMPONG, a/k/a "Montana," and TOURAY BLACKWOOD, the defendants, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, TRICE, ACHEAMPONG, and BLACKWOOD deposited checks with names and bank account numbers of other persons during and in relation to the conspiracy to commit bank fraud and bank fraud charged in Counts One and Two of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

5. I am a United States Postal Inspector. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, my conversations with other law enforcement officials, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. Based on my review of records from a national bank ("Bank-1") and my conversations with a Bank-1 employee, I have learned that from in or about September 2018 up to and including November 2018, the defendants individually, and with each other and/or others, did deposit or attempt to deposit forged or stolen checks into bank accounts not belonging to them. Specifically, I have learned in substance and in part:

a. On or about October 4, 2018, surveillance footage captured a man I later identified as RASHAUN TRICE, the defendant, depositing a check in the amount of \$9,000 ("Check-1") at a Bank-1 Automated Teller Machine ("ATM") in the Bronx, New York, into the bank account of a third-party ("Account-1"). Check-1 was later identified by the bank that issued Check-2 as altered and/or counterfeit.

b. On or about October 10, 2018, surveillance footage captured TRICE depositing into Account-1 a check in the amount of \$9,650 ("Check-2") at an ATM for Bank-1 in New Rochelle, New York. Check-2 was later identified by the bank that issued Check-2 as altered and/or counterfeit.

c. On or about October 2, 2018, surveillance footage captured a woman ("CC-1") depositing a check in the amount of \$7,000 ("Check-3") at an ATM for Bank-1 in the Bronx, New York, into a Bank-1 bank account ("Account-2") that I later identified as CC-1's own account. Check-3 was later identified by the bank that issued Check-3 as altered and/or counterfeit.

d. On or about October 9, 2018, surveillance footage captured CC-1 depositing into Account-2 a check in the amount of \$9,000 ("Check-4") at an ATM for Bank-1 in the Bronx,

New York. Check-4 was later identified by the bank that issued Check-4 as altered and/or counterfeit.

e. On or about October 18, 2018, surveillance footage captured CC-1 depositing into Account-2 a check in the amount of \$8,700 ("Check-5") at an ATM for Bank-1 in the Bronx, New York. Check-5 was later identified by the bank that issued Check-5 as altered and/or counterfeit.

f. On or about October 17, 2018, surveillance footage captured a man I later identified as SCOTT ACHEAMPONG, a/k/a "Montana," the defendant, depositing a check in the amount of \$9,300 ("Check-6") at an ATM for Bank-1 in Hamilton Heights, New York, into the account of a third party ("Account-3").

g. On or about October 15, 2018, surveillance footage captured TRICE depositing a check in the amount of \$8,000 ("Check-7") at an ATM for Bank-1 in the Bronx, New York, into the account of a third party ("Account-4").

h. On or about October 24, 2018, surveillance footage captured TRICE depositing a check in the amount of \$8,300.50 ("Check-8") at an ATM for Bank-1 in the Bronx, New York, into Account-4. Check-8 was later identified by the bank that issued Check-8 as altered and/or counterfeit.

i. On or about October 8, 2018, surveillance footage captured a man later identified as TOURAY BLACKWOOD, the defendant, making a cash deposit in the amount of \$1,000 into Account-4 at an ATM for Bank-1 in the Bronx, New York. On or about October 12, 2018, surveillance footage captured BLACKWOOD making a withdrawal in the amount of \$1000 from Account-4 at an ATM for Bank-1 in the Bronx, New York.

j. On or about October 29, 2018, surveillance footage captured ACHEAMPONG depositing a check in the amount of \$8,400 ("Check-9") at an ATM for Bank-1 in Mount Vernon, New York, into the account of a third party ("Account-5").

k. On or about November 16, 2018, surveillance footage captured TRICE depositing into Account-5 a check in the amount of \$9,602.42 ("Check-10") at an ATM for Bank-1 in the Bronx, New York. Check-10 was later identified by the bank that issued Check-10 as altered and/or counterfeit.

l. On or about November 21, 2018, surveillance footage captured TRICE depositing into Account-5 a check in the

amount of \$9,474.12 ("Check-11") at an ATM for Bank-1 in the Bronx, New York.

m. On or about November 1, 2018, surveillance footage captured TRICE depositing a check in the amount of \$9,652 ("Check-12") at an ATM for Bank-1 in the Bronx, New York, into the account of a third party ("Account-6"). Check-12 was later identified by the bank that issued Check-12 as altered and/or counterfeit.

n. On or about October 26, 2018, surveillance footage captured BLACKWOOD making a cash deposit in the amount of \$300 at a Bank-1 ATM in the Bronx, New York, into Account-6. On or about October 27, 2018, surveillance captured BLACKWOOD making a withdrawal in the amount of \$500 from Account-6 at a Bank-1 ATM in the Bronx, New York.

o. On or about November 8, 2018, surveillance footage captured ACHEAMPONG depositing a check in the amount of \$11,500 ("Check-13") at an ATM for Bank-1 in the Bronx, New York, into the account of a third party ("Account-7"). Check-13 was later identified by the bank that issued Check-13 as altered and/or counterfeit.

p. On or about November 9, 2018, surveillance footage captured TRICE depositing a check in the amount of \$8,927.57 ("Check-14") at an ATM for Bank-1 in the Bronx, New York, into the account of a third party ("Account-8").

q. On or about November 16, 2018, surveillance footage captured TRICE depositing a check in the amount of \$9,676.22 ("Check-15") at an ATM for Bank-1 in the Bronx, New York, into the account of a third party ("Account-9"). Check-15 was later identified by the bank that issued Check-15 as altered and/or counterfeit.

r. On or about November 21, 2018, surveillance footage captured TRICE depositing into Account-9 a check in the amount of \$7,500 ("Check-16") at an ATM for Bank-1 in the Bronx, New York. Check-16 was later identified by the bank that issued Check-16 as altered and/or counterfeit.

s. On or about November 21, 2018, surveillance footage captured ACHEAMPONG depositing a check in the amount of \$8,308.35 ("Check-17") at an ATM for Bank-1 in the Bronx, New York, into an account for a third party ("Account-10").

t. On or about November 17, 2018, surveillance footage captured BLACKWOOD making a cash deposit in the amount of \$900 into Account-10 at a Bank-1 ATM in the Bronx, New York, and then subsequently withdrawing \$900 from Account-10 at the same Bank-1 ATM.

u. On or about November 23, 2018, surveillance footage captured BLACKWOOD depositing a check in the amount of \$8,700 ("Check-18") at an ATM for Bank-1 in the Bronx, New York, into a bank account belonging to BLACKWOOD ("Account-11").

v. On or about November 16, 2018, surveillance footage captured a man depositing a check in the amount of \$8,500 ("Check-19") at an ATM for Bank-1 in the Bronx, New York, into an account for a third party ("Account-12").

w. On or about November 27, 2018, surveillance footage captured a man depositing a check in the amount of \$13,000 ("Check-20") at an ATM for Bank-1 in the Bronx, New York, into an account for a third party ("Account-13"). Check-20 was later identified by the bank that issued Check-20 as altered and/or counterfeit.

x. The same device cookie was used to access online banking for Account-1 and Account-9.

y. The same device cookie was used to access online banking for Account-4, Account-5, Account-6, Account-7, Account-10, and Account-11.

z. The same device cookie was used to access online banking for Account-2, Account-3, Account-5, Account-7, Account-12, and Account-13.

aa. The deposits of Bank-1 are insured by the Federal Deposit Insurance Corporation.

7. Based on my training and experience, I understand that a device cookie is a unique file that contains data specific to each website that is visited from a particular web browser on a particular device. The device cookie allows that particular web browser on that particular device to remember certain types of information specific to the user of the device from previous sessions. If device cookies are enabled on a browser, then they are automatically generated whenever the user visits a new webpage. Furthermore, I understand that because

device cookies are unique files specific to particular devices, if the same device cookie was used to access a particular website at different times, then that particular website was visited using the same device.

8. Based on my conversation with the person from whose bank account Check-6 was drawn, I learned that Check-6 was fraudulent and she did not write any check to the holder of Account-3.

9. Based on my conversation with the person from whose bank account Check-7 was drawn, I learned that Check-7 was fraudulent and he did not write any check to the holder of Account-4.

10. Based on my conversation with the person from whose bank account Check-9 was drawn, I learned that Check-9 was fraudulent and he did not write any check to the holder of Account-5.

11. Based on my conversation with the person from whose bank account Check-11 was drawn, I learned that Check-11 was fraudulent and he did not write any check to the holder of Account-5.

12. Based on my conversation with a representative from the company from whose bank account Check-14 was drawn, I learned that Check-14 was fraudulent and the company did not issue any check to the holder of Account-8.

13. Based on my conversation with one of the persons from whose bank account Check-17 was drawn, I learned that Check-17 was fraudulent and she did not write any check to the holder of Account-10.

14. Based on my conversation with the person from whose bank account Check-18 was drawn, I learned that Check-18 was fraudulent and she did not write any check to TOURAY BLACKWOOD, the defendant.

15. Based on my conversation with one of the persons from whose bank account Check-19 was drawn, I learned that Check-19 was fraudulent and she did not write any check to the holder of Account-12.

16. I identified the man captured in the surveillance video depositing Check-1 as RASHAUN TRICE, the defendant, by

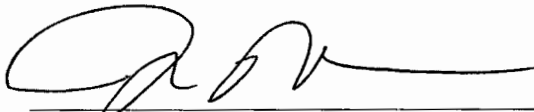
running a screenshot of the surveillance footage through a facial recognition program, which identified him as TRICE from New York City Police Department ("NYPD") arrest records. I was then able to identify the man captured in the surveillance video depositing Check-2, Check-7, Check-10, Check-11, Check-12, Check-14, Check-15, and Check-16 as TRICE based on a comparison between the surveillance footage and photos of TRICE maintained by the NYPD and the New York Department of Motor Vehicles ("DMV").

17. I identified the man captured in the surveillance video depositing Check-18 as TOURAY BLACKWOOD, the defendant, by comparing the surveillance footage with the photo of BLACKWOOD maintained by the DMV. I was then able to identify the man captured in the surveillance video making deposits on October 8, 2018, October 24, 2018, and November 17, 2018, as described above in paragraphs 6(i), (n), and (t), respectively, as BLACKWOOD based on a comparison between the surveillance footage and photos of BLACKWOOD maintained by the NYPD and the DMV.

18. I identified the man captured in the surveillance video depositing Check-13 as SCOTT ACHEAMPONG, a/k/a "Montana," the defendant, by comparing the surveillance footage with a photo of ACHEAMPONG from Yonkers Police Department arrest records. I was then able to identify the man captured in the surveillance video depositing Check-6, Check-9, and Check-17 as ACHEAMPONG based on a comparison between the surveillance footage and photos of ACHEAMPONG maintained by the DMV and the Yonkers Police Department.

WHEREFORE, deponent respectfully requests that warrants be issued for the arrests of TRICE RASHAUN, SCOTT ACHEAMPONG, a/k/a "Montana," and TOURAY BLACKWOOD, the

defendants, and that they be arrested, and imprisoned or bailed, as the case may be.



ROBERT W. MOERLER
Postal Inspector
United States Postal Inspection Service

Sworn to before me this
23rd day of July, 2019



THE HONORABLE STEWART D. AARON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK